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AmericanMotorcyclist.com

April 22, 2014

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, DC 20460

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EXECUTIVE SECRETARIAT

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Dear Administrator McCarthy:

The American Motorcyclist Association seeks copies of the reports or studies authored by the U.S. Environmental Protection Agency regarding the effect of ethanol on engines. Specifically, the reports or studies cited in the Federal Trade Commission's rule proposal to provide requirements for rating and certifying ethanol blends and requirements for labeling blends of more than 10 percent ethanol.¹ The AMA opposes the availability of E15, because it can damage engines and fuel systems on motorcycles and all-terrain vehicles and can void manufacturers' warranties.

Founded in 1924, the AMA is the premier advocate of the motorcycling community, representing the interests of millions of on- and off-highway motorcyclists. Our mission is to promote the motorcycle lifestyle and protect the future of motorcycling.

The emergence of higher ethanol blended fuels is a serious concern to AMA and the millions of motorcyclists sharing the roads and highways all across the United States. Even with E15 in the marketplace, inadvertent misfueling may readily occur.

According to *Federal Register* notice, "the record... shows a risk that misfueling may harm conventional vehicles and non-road engines." As EPA explained, "[e]thanol impacts motor vehicles in two primary ways. First... ethanol enleans the [air/fuel] ratio (increases the proportion of oxygen relative to hydrocarbons) which can lead to increased exhaust gas temperatures and potentially increase incremental deterioration of emission control hardware and performance over time, possibly causing catalyst failure. Second, ethanol can cause materials compatibility issues, which may lead to other component failures."²

"In motorcycles and nonroad products [using E15 and higher ethanol blends], EPA raised engine-failure concerns from overheating."³

¹ <https://www.federalregister.gov/articles/2014/04/04/2014-07423/automotive-fuel-ratings-certification-and-posting>, accessed April 22, 2014.

² *Ibid.*

³ *Ibid.*

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As part of the EPA's waiver process to allow E15 into the marketplace, the Federal Trade Commission stated in the notice that the EPA relied on "its technical and engineering expertise." This technical and engineering expertise determined that the "use of E15 and higher blends in certain vehicles and engines ... found that ethanol has properties that can damage older conventional cars, heavy-duty gasoline engines and vehicles, motorcycles, and nonroad products."⁴

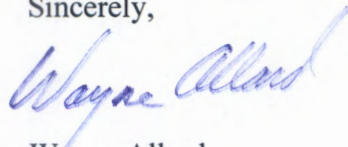
Since this information must be in the form of a report or study, the AMA requests a copy.

Please understand that the AMA wants access to safe fuels for motorcycles and ATVs. Given marketplace realities, wherever E15 and higher-ethanol blended fuels are sold, there will very likely be inadvertent misfueling issues. As you know, motorcycles and ATVs are not approved for any fuel with more than 10 percent ethanol.

The loser in any inadvertent misfueling event is the motorcyclist or ATV rider. The AMA stands behind its members, and all riders, in calling for more thorough misfueling safeguards.

Thank you for your time and consideration of our request. If you have questions, please do not hesitate to contact me by phone, (202) 742-4301, or by email, wallard@ama-cycle.org.

Sincerely,



Wayne Allard
Vice President, Government Relations

⁴ <https://www.federalregister.gov/articles/2014/04/04/2014-07422/automotive-fuel-ratings-certification-and-testing>, accessed April 22, 2014.



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